

1 UNITED STATES BANKRUPTCY COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 Case No. 20-22476-mg

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5 In the Matter of:

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7 FRONTIER COMMUNICATIONS CORPORATION,

8

9 Debtor.

10 - - - - - x

11

12 United States Bankruptcy Court

13 One Bowling Green

14 New York, NY 10004

15

16 April 30, 2024

17 2:06 p.m.

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19

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21 B E F O R E :

22 HON MARTIN GLENN

23 U.S. BANKRUPTCY JUDGE

24

25 ECRO: F. FERGUSON

1 HEARING re Hybrid Discovery Conference re: Record Company
2 Claimant's request (Doc ##2330, 2331, 2338, 2339, 2345)

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Transcribed by: Sonya Ledanski Hyde

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1 P R O C E E D I N G S

2 CLERK: Good afternoon. Starting the recording
3 for the hearing on April 30th, 2024 at 2 p.m. Calling
4 Frontier Communications Corporation, Case No. 20-22476. Do
5 we have any parties in the courtroom that are giving their
6 appearance?

7 MR. COHEN: Yes.

8 MS. ALQUIST: Yes.

9 CLERK: If you could come to the middle podium to
10 do so.

11 MS. ALQUIST: Hi. Beth Alquist with Day Pitney
12 for Frontier Communications.

13 CLERK: Okay, thank you, Beth.

14 MS. ALQUIST: And there's more.

15 MR. COHEN: Joshua Cohen from Day Pitney also for
16 Frontier.

17 CLERK: Yeah.

18 MR. TROPP: Jonathan Tropp, also of Day Pitney and
19 also for Frontier.

20 CLERK: Okay, thank you.

21 MR. TROPP: You want to just tell (indiscernible)?

22 MR. KLIMMEK: Chris Klimmek from Day Pitney for
23 Frontier Communications. I'm actually -- I haven't appeared
24 in the case yet because I'm still in the process of getting
25 admitted in the SDNY.

1 CLERK: Okay.

2 MR. KLIMMEK: So I am an observer. I will not
3 speak unless the judge authorizes me to.

4 CLERK: Understood. All right, thank you.

5 MR. MAS: Good afternoon. This is Ildefonso Mas
6 from Akerman on behalf of Frontier.

7 CLERK: Okay, thank you. All right, if there's --
8 Pedro, are you still there? So, if there's anyone in the
9 courtroom that needs to state their appearance, if you could
10 come to the middle podium to do so.

11 MR. OPPENHEIM: Yes, good afternoon. It's Matt
12 Oppenheim from Oppenheim and Zebrak. I have here with me
13 Corey Miller, Alex Kaplan, and Carly Rothman, among others,
14 from our firm on behalf of the RCCs.

15 CLERK: Thank you.

16 MR. LUSKIN: Good afternoon. Michael Luskin,
17 Morgan Lewis, for the RCCs. Thank you.

18 CLERK: Thank you. All right, do we have any
19 additional parties in the courtroom? Okay. Do we have any
20 parties on Zoom? Mr. Culpepper, we're -- start with you.

21 MR. CULPEPPER: Good afternoon, everyone. Kerry
22 Culpepper appearing on behalf of the movie company
23 claimants.

24 CLERK: Thank you.

25 MR. LETTEN: Good afternoon. Matthew Letten from

1 Day Pitney on behalf of Frontier.

2 CLERK: All right, thank you. All right, I'll
3 pause the recording again for now.

4 (Pause)

5 CLERK: Mr. Twardy, if you could give your
6 appearance for the record.

7 MR. TWARDY: Sure. Stanley Twardy from the law
8 firm Day Pitney for the Debtor Frontier.

9 CLERK: Okay, thank you. Are the parties ready to
10 proceed?

11 MR. OPPENHEIM: I think we're making great
12 progress trying to resolve some of these issues. Could we
13 have five more minutes?

14 CLERK: Okay, we'll ask the judge. Thank you.
15 (Pause)

16 THE COURT: Please be seated. Good afternoon.

17 GROUP: Good afternoon, Your Honor.

18 THE COURT: All right. Mr. Oppenheim, do you want
19 to begin?

20 MR. OPPENHEIM: Good afternoon, Your Honor and
21 appreciate you giving us a few extra moments. It gave the
22 parties an opportunity to have a discussion about many of
23 the issues that have arisen over the last several weeks. As
24 our letter set forth, we -- the record companies have had
25 significant concerns about the manner in which discovery has

1 come from Frontier and that concern has been in part a
2 failure to produce, and now, a kind of complete dump of
3 everything at the very last minute in a way that will make
4 it extremely difficult for us to proceed with depositions in
5 the way that we would like to.

6 We are intent on moving forward on the Court's
7 schedule. We are intent on prosecuting this case the way it
8 needs to be prosecuted, but are disappointed that that this
9 has happened the way it has happened, Your Honor. And to
10 put that into context, Your Honor, so today, Frontier -- let
11 me just by way of example, on the email front, Frontier
12 finally has produced emails, 22,800 or so emails to date.
13 Of those, 21,467 were produced in the last roughly week.

14 Within their -- another example. Within their
15 production, one of the things they produced was a
16 declaration from a subscriber, a subscriber who was a repeat
17 infringer. This declaration is on a In re: Frontier
18 caption and was signed in November. And does not seem to be
19 any rational explanation for it's not having been produced
20 then, but being produced literally in the last several days
21 of discovery. Now --

22 THE COURT: What is it relevant to? What do you
23 believe it was -- what request was it responsive to?

24 MR. OPPENHEIM: So, I can't know how Frontier
25 intends to use this declaration. They obviously got it for

1 some reason.

2 THE COURT: What document request that you made do
3 you believe its production was responsive to?

4 MR. OPPENHEIM: It's certainly a document
5 responsive to the request for documents related to repeat
6 infringers and the termination of repeat infringers. On the
7 face of it, it's a declaration about a subscriber who is
8 sent a termination letter and Frontier ultimately decided
9 not to terminate. Leave aside that, you know, there's been
10 an agreement that we've -- we're okay with for them to
11 redact PII on all the subscribers.

12 But when it serves their purpose, they, you know,
13 they use the name and they go and they talk to the
14 subscriber and they bring it forward, which is a little one
15 sided. We could never do that because we don't have the
16 subscriber's name and address. That's a, that's an issue
17 for another day, but --

18 THE COURT: You should have the subscriber's name.

19 MR. OPPENHEIM: Well, we have --

20 THE COURT: -- under seal, but --

21 MR. OPPENHEIM: We have this subscriber's name.

22 THE COURT: Yeah.

23 MR. OPPENHEIM: Because this subscriber they
24 decided to go and talk to and get a declaration from because
25 they think they can tell a good story from this subscriber's

1 perspective. There are tens of thousands of repeat
2 infringers that Frontier had and was dealing with, receiving
3 infringement notices from, and by agreement, those -- we
4 don't know the names of those subscribers. We're not going
5 to go and talk to all those subscribers and we agreed to
6 that.

7 I just find it a little ironic and somewhat
8 disconcerting that they can -- it's a sword/shield issue,
9 Your Honor, that they decide oh, it's so confidential that
10 we can't tell you all the names.

11 THE COURT: Well, let me back up. Did I enter
12 some order that said they didn't have to disclose the names
13 of repeat infringers? I don't think so.

14 MR. OPPENHEIM: No. We did discuss it at one of
15 the early hearings and we --

16 THE COURT: There's a difference between public
17 disclosure of the names and -- I mean, there's a protective
18 order in place. There's a means to be able to provide
19 discovery of the names subject to, you know, appropriate
20 protection. But I'll ask the question again. Did I order
21 that names not be disclosed and discovered?

22 MR. OPPENHEIM: You did not, Your Honor.

23 THE COURT: Okay. So, what are you complaining
24 about? That's your -- if -- I'm -- you know, I'm serious to
25 this (indiscernible). If you believe you need the names of

1 the subscribers who were repeat infringers, ask for them and
2 you'll get them. And there will be an appropriate, you
3 know, confidentiality. I think the existing confidentiality
4 order will be sufficient to provide the protection for it.

5 MR. OPPENHEIM: Very well.

6 THE COURT: That isn't to say that you can't reach
7 out and contact people or subpoena them. Look, you have the
8 burden at trial and you have to show, as I understand it,
9 you need to show the primary act of infringement in order to
10 be able to recover for contributory infringement.

11 MR. OPPENHEIM: Yes.

12 THE COURT: Okay. I may not have said that as
13 fancy as you would, but that's what I basically understand.
14 Okay. So, you know, unless you negotiate an agreement with
15 Frontier, you know, a stipulation for purposes of use at
16 trial, you know, I don't know how many repeated infringers
17 there are, and if they're really going to make you put into
18 the evidence of every act of repeated infringement.

19 Okay, load the boxes up and they'll come in. But
20 otherwise, you know, if that -- if they're going to fight
21 the battle about who were the repeat infringers, have you
22 satisfactorily put in proof of the direct infringement, then
23 do what you have to do to prove your case. Okay?

24 MR. OPPENHEIM: Very well, Your Honor.

25 THE COURT: But I certainly never intended to

1 shield from discovery the names of the repeat infringers.

2 You have to prove it.

3 MR. OPPENHEIM: Very well, Your Honor.

4 THE COURT: So you're entitled to get discovery
5 on.

6 MR. OPPENHEIM: We'll meet and confer with the
7 other side to address this issue. I don't believe for
8 purposes of demonstrating the underlying direct infringement
9 that we'll need the identities of the underlying subscribers
10 --

11 THE COURT: Okay.

12 MR. OPPENHEIM: -- but for other purposes --

13 THE COURT: I'm not telling you how to prove your
14 case.

15 MR. OPPENHEIM: Yeah. Very well. I appreciate
16 that, Your Honor. We came into this hearing with many
17 issues that we laid out in our letter. Prior to this
18 hearing, we've been talking to opposing counsel. I believe
19 by agreement, we've resolved most of those issues in the --
20 and Frontier has agreed to either produce the outstanding
21 documents or to search for them, or in some instance, they
22 say they don't exist. And we're -- we appreciate Frontier's
23 effort in that regard and we'll work with them on that
24 basis.

25 So, the only thing at this point that we would ask

1 for as relief from the Court is with respect to the way --
2 the timing in which this discovery came out with the vast
3 majority of it not being produced on a rolling basis as this
4 Court instructed early on, but -- and clearly withholding
5 materials until the very end.

6 This November Declaration should have been
7 produced a very long time ago -- is that we'll proceed with
8 the depositions on the current schedule, but as we're
9 reviewing documents to the extent we review additional
10 documents related to a deposition that we've already taken
11 that the -- that we be permitted to reopen depositions with
12 respect to newly reviewed -- not newly produced but newly
13 reviewed materials as needed.

14 THE COURT: I'm not -- based on what you've said
15 so far, I'm not inclined to grant that relief. I haven't
16 heard from the other side yet, you know, what the total
17 volume of paper and electronic materials that have been
18 produced in discovery. Yes, I expected rolling production.
19 I didn't say how many documents a week or -- I don't know
20 what difficulties Frontier had in gathering information.

21 They, from their letter, indicate that the
22 enormous resources that they've had to devote to providing
23 the discovery, and I'll assume for purposes of discussion
24 that it's so. Whether those resources were all added on in
25 the last couple of weeks to get the information produced,

1 the question would -- then would be, why didn't they do it
2 earlier? Okay. But I'm not -- I don't want to get into the
3 back and forth about that.

4 So put the resources you need to produce the
5 documents be before the depositions. It's one thing when
6 it's -- you know, when I think back, the years I was
7 litigating, it was almost inevitable that additional
8 documents always, you know, come out. You ask -- you see
9 something and you ask a question about it and they search in
10 good faith. More documents are found.

11 And you know, it's one thing to ask to reopen a
12 deposition because of some significant piece of evidence
13 that was produced after the deposition was taken. And you
14 know, most of the time I remember never having to go to a
15 Court to ask about it. Counsel just worked it out. Yeah,
16 okay, this is -- we understand that this is -- document, at
17 least this handful of documents produced after, you want to
18 be able to depose Mr. Smith about it. We'll make him
19 available for a short additional deposition to do that.

20 That's just give and take of litigation. Okay.
21 So, I'm not willing to ascribe bad faith to what you
22 describe as the late production of documents. It sounds
23 like more or less they met the deadline for substantial
24 production.

25 MR. OPPENHEIM: Well --

1 THE COURT: You said it should have been earlier.
2 But -- okay.

3 MR. OPPENHEIM: So, if I may clarify.

4 THE COURT: Yeah, go ahead.

5 MR. OPPENHEIM: So, with respect to email
6 production, assuming they've now produced everything, yeah,
7 they produced 94 percent of it in the last roughly week.
8 That's not a rolling production to me, but we'll put the
9 resources in. We'll do our best as we can to review it and
10 make it applicable.

11 The data is a different issue and it presents a
12 significant problem, and let me try to --

13 THE COURT: Let me just stop for a second, okay?
14 I would be really unhappy -- and I do bad things when I'm
15 unhappy -- if I found out that they've had the stuff set
16 aside for the last month-and-a-half and they just produced
17 it last week. I'm not accusing anybody of anything. I just
18 -- but if that -- if those were the facts that it turned out
19 to be, bad things would happen. Okay. You know, it just --
20 let me stop there. Go ahead, mister --

21 MR. OPPENHEIM: And to be clear, I think since the
22 Day Pitney firm has come on, they have probably thrown a lot
23 of resources at this. But this is not a case against Day
24 Pitney. It's a case against Frontier. And the question is,
25 did Frontier start actually actively pursuing the production

1 of documents after they received our document requests in
2 November of last year or did they wait until Day Pitney was
3 retained --

4 THE COURT: -- deposition and find out, go ahead.

5 MR. OPPENHEIM: Yeah. So, the issue where it
6 really becomes difficult is the issue on the data and the
7 Day Pitney lawyers have told us today they're going to do
8 their best to try to address the data holes. But to give
9 you a sense of what this is and why it's problematic. Rough
10 -- so we -- the record companies, not the movie studios, the
11 record companies alone during the claim period sent 54.5
12 thousand infringement notices to Frontier. These --

13 THE COURT: -- paper copies or just emailed them?

14 MR. OPPENHEIM: They're sent by email in a
15 particular way so they can be read from a computer. The
16 computer can read them. They're generally sent with, I
17 think what's called an XML script. But they're sent in a
18 way so the computers can read them. The Frontier MariaDB
19 database which we've spoken about repeatedly here, has a
20 reports table which tracks these notices. That reports
21 table is missing 7,500 of those 54,000 notices.

22 Well, what does that mean? That means that we
23 don't know who the Frontier subscriber was, who was
24 responsible for the infringement at issue for 13.7 percent
25 of the infringement notices in this case. That's a problem.

1 We don't -- we can't track those notices. We can't track
2 the level of infringement for those repeat infringers.

3 THE COURT: Do they cover a particular time
4 period?

5 MR. OPPENHEIM: They -- so some of them come from
6 an early time period where Frontier says they didn't
7 maintain the data, which will become an issue at trial and
8 we'll deal with it. But there is a --- there are notices
9 missing throughout the entire claim period beyond that.

10 THE COURT: You know that because why?

11 MR. OPPENHEIM: Because we've analyzed it. We've
12 looked at the dates of the notices month by month compared
13 to their data and we're seeing what's missing. So -- and we
14 -- they do keep a database of the actual notices apart from
15 their database that compiles the notices, and they often
16 have the actual copies of the notices that they don't have
17 in their database that they use for tracking the notices.

18 So, we know they got them, but they didn't track
19 them. So, this is a problem. We're going to try to figure
20 out how to solve it. They're going to look for those
21 notices and if they can't find them, they're going to try to
22 do lookups in IP lease logs to identify the subscribers.
23 So, the parties are working towards a solution.

24 THE COURT: Did you -- you have no doubt inquired
25 why aren't they there. Have you -- what answers have you

1 gotten?

2 MR. OPPENHEIM: I don't think we have an answer
3 yet, but I think that's an issue that Frontier is
4 investigating based on our discussions recently. So -- and
5 of course, since the substantial completion deadline was
6 only on Thursday, this is all quite recent and fresh. So,
7 the issue then is magnified because the next step of the
8 process in analyzing the repeat infringement by Frontier
9 subscribers is we have to look at that reports database that
10 MariaDB reports database and look at the account numbers,
11 but it doesn't use account numbers. It uses something
12 called owners, which is -- it's a hash number related to a
13 modem MAC ID.

14 We get it. They get it. They have to give us a
15 translation table and they did. But that translation table
16 is missing numerous entries, so we can't translate from one
17 database to the next. Again --

18 THE COURT: How do you know it's missing entries?

19 MR. OPPENHEIM: Because you can see that there's -
20 - A, we've got owner numbers for which there are no account
21 numbers, and sometimes you have owner numbers and it's
22 literally just a blank. So, we're working on this with
23 Frontier.

24 THE COURT: But I just -- let's assume there's no
25 answer to it, that -- okay. I suspect you've either

1 encountered this issue before or you figured out what you're
2 going to try and prove a trial, what inferences you're going
3 to try and draw. You know, it may be that this is going to
4 work against Frontier, because they can't -- if you have
5 copies of the infringement notices and shown that it was
6 sent to them and there's an absence of data on their part
7 and their practice was to keep the data, you may be able --
8 you'll ask the Court to draw adverse inferences from the
9 absence of the files.

10 They -- you're absolutely correct trying to get to
11 understand, you know, get to the bottom of it. But the
12 answer at the end of the day may be an unsatisfactory one.
13 There are 7,000 missing entries. Okay? So there's 7,000 --
14 and you'll make whatever arguments you're going to make from
15 the absence of the entries. They can't create documents
16 that don't exist in their records. They can't create data
17 that isn't in their records.

18 MR. OPPENHEIM: Absolutely, Your Honor. And we'll
19 do that, if that's where we are and have done that in the
20 past and understand that. But while we're working through
21 these issues, to the extent that this data is produced over
22 the course of the next several weeks and it requires us to
23 ask to either reopen or push certain deadlines, we may
24 either ask opposing counsel or come to the Court and request
25 that relief because, unfortunately, we're not quite where we

1 would have hoped to have been at this point, but we're
2 working on it. So, I'll leave it at that, Your Honor. I do
3 think there are serious questions about why it took so long
4 for Frontier to gear up its production, but we appreciate
5 that they're there now.

6 THE COURT: Okay. Who wants to speak for --

7 MR. TWARDY: Yes, Your Honor, this is Stan Twardy.
8 Attorney Alquist who is there will be handling this for us
9 today.

10 THE COURT: Okay.

11 MR. TWARDY: Thank you, Your Honor.

12 THE COURT: Nice to see you on the screen, Mr.
13 Twardy.

14 MR. TWARDY: Thank you, Your Honor. Thank you for
15 letting me do it from afar.

16 THE COURT: Sure. Okay. Go head.

17 MS. ALQUIST: Good afternoon, Your Honor. I am
18 Beth Alquist for Frontier, and I'll just respond very
19 briefly to contextualize it.

20 THE COURT: You know, I'm feeling guilty that --
21 but only a little guilty, that the dates for the trial may
22 not coincide with the rest of your schedule, but I am
23 mindful of it, but I got my own problems.

24 MS. ALQUIST: I appreciate that, Your Honor. I
25 do, too, and I just can't move it in appeal in New Zealand,

1 and there I'll be.

2 THE COURT: Okay.

3 MS. ALQUIST: But I will be here until --

4 THE COURT: There are worse places to be than
5 there.

6 MS. ALQUIST: Worse things have happened to me. I
7 spent a month there trying a case and now I'm going to spend
8 a two-day appeal. Didn't see that coming. In any event, to
9 contextualize this for Your Honor, we haven't been sitting
10 on a pile of documents just to send them over at the end and
11 I suspect the other side hasn't, either. The fact of the
12 matter is the parties and specifically MCC and RCC didn't
13 agree to the search terms we were going to use to search our
14 emails until March 29th. RCC agreed to it about a week
15 earlier. MCC agreed to it March 29th.

16 And from March 29th until April 25th, we had 35 to
17 45 lawyers and paralegals working literally around the clock
18 to get all the documents out and we produced about 25,000.
19 RCC from March 29th to date, produced 13,748 documents.
20 Prior to that, they had produced 3,207. As Your Honor
21 pointed out --

22 THE COURT: That's why I like sitting here rather
23 than out where you are.

24 MS. ALQUIST: A hundred percent. A hundred
25 percent, Your Honor. But as you pointed out, this happens

1 in complex IP litigations. The parties produce things.
2 They do their best. Things get missed. Deficiencies happen
3 and the parties talk about it.

4 What was disappointing to Frontier was that a
5 letter went to Your Honor last night without contacting us
6 and asking us those questions and your clerk had to sit
7 through and listen to us work them all out within about 15
8 minutes. That's what should happen. We proposed, and I'm
9 happy to say that the other side has accepted, a weekly
10 standing meeting so that both sides can talk about discovery
11 deficiencies because we have them, too, Your Honor.

12 THE COURT: Sounds like a perfect solution. Maybe
13 not perfect, gut it sounds like it's well on the way to --

14 MS. ALQUIST: I agree, and Attorney Cohen gets all
15 the credit for that, but I took the credit for it during the
16 meeting, and I'm wont to do. So, that is the fact of the
17 matter. We hear issues about data and it missing. We asked
18 on April 18th for some information about what was then
19 30,000 alleged missing data entries. Turns out we didn't
20 get a response to that and then it became only 7,500. They
21 must have figured something out. And now, they've agreed
22 today about an hour ago to provide us with the data we need
23 to be able to go find out what they're talking about and if
24 there's an answer or not. Frontier has been working
25 diligently to do that. The rules apply both ways and we all

1 intend to meet Your Honor's deadlines.

2 THE COURT: Let me just say, as much as I love
3 having you here, it's very rare that I actually have
4 discovery conferences in the courtroom and that was true
5 even before the pandemic and with, you know -- I wanted to
6 get you all here today because it sounds like you -- the
7 first thing that you told me about that makes perfect sense
8 is to have the weekly meetings or calls. May be necessary
9 to have more than weekly, not with the whole group, but to
10 work your way through this. Okay.

11 And if that's the case -- so I thought, okay, I
12 got these competing letters and, you know, you say bad
13 things about the other. If they would have told us first,
14 et cetera. We can hopefully avoid you having to travel here
15 to the courtroom. When it's appropriate, we will. Okay.
16 But these are -- every big case has its problems in
17 discovery.

18 Just, every case that I was ever involved in,
19 where lawyers have acted in entire good faith and have had
20 appropriate resources devoted to it, stuff just happens and
21 getting your clients to -- you know, you communicate with
22 your clients and they may not actually understand that you
23 really mean it. They really have to find it. Okay. That
24 just happens. That's what it's like. Okay.

25 If you're talking to each other and giving each

1 other the information that you need to go back to the
2 Frontier and vice versa with the record companies and the
3 movie companies, you're going to move ahead a lot faster.
4 Yes, it's an aggressive schedule which I intend to hold.
5 Okay. You know, nothing in these letters struck me as --
6 you know, I've seen this a dozen times and it just -- okay,
7 you -- but you can -- I guess the one clear message, I've
8 said a bunch of times, you can move forward on the schedule.
9 This is the schedule.

10 MS. ALQUIST: We agree, Your Honor. Frontier
11 plans to meet that and I think the weekly calls will help a
12 great deal and hopefully all of these people can go back to
13 reviewing documents and not being in this courtroom. Thank
14 you, Your Honor.

15 THE COURT: Okay. All right, thank you, Ms.
16 Alquist. Anybody else want to be heard? Is there anything
17 that needs more guidance? It sounds like you all -- you
18 know, it's not like one side is saying no, never, we're
19 never going to produce this. That's not what I'm hearing
20 today. It's not this -- okay.

21 The last thing I would say is, if there are
22 problems, don't hesitate to write the Court and we'll have
23 another conference. I just, you know, I'm holding you to
24 the schedule. That ought to be clear to you all. There's a
25 lot of work that has to be done.

1 I really do think that many of the sort of
2 foundational issues you ought to be able to try and resolve
3 through stipulations and avoid having to go through
4 thousands of pages of documents for an effort that probably
5 isn't going to be worth fighting about at the end of the
6 day. You have plenty of issues that you are going to fight
7 about. I understand that.

8 All right, anybody on the -- on Zoom who wants to
9 be heard? Mr. Culpepper? I know you were -- I saw you
10 briefly. Do you want to be heard on anything?

11 MR. CULPEPPER: Thank you, Your Honor. Kerry
12 Culpepper appearing on behalf of movie company claimants. I
13 don't have anything to add, Your Honor.

14 THE COURT: Okay. All right. All right. The
15 longer I don't hear from you, the happier I'm going to be.
16 It means that you're moving things along without having to
17 go to the Court about it. Okay. All right. So, thanks
18 very much.

19 (Whereupon these proceedings were concluded at
20 2:34 PM)

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C E R T I F I C A T I O N

I, Sonya Ledanski Hyde, certified that the foregoing
transcript is a true and accurate record of the proceedings.



Sonya Ledanski Hyde

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Date: May 1, 2024